

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth, PBA and HTA.

**ORDER GRANTING FIVE HUNDRED TWENTIETH OBJECTION (SUBSTANTIVE) OF
THE COMMONWEALTH OF PUERTO RICO, THE PUERTO RICO PUBLIC BUILDINGS
AUTHORITY, AND THE PUERTO RICO HIGHWAYS AND TRANSPORTATION
AUTHORITY TO PARTIALLY SATISFIED, DEFICIENT, AND/OR DUPLICATE CLAIMS**

*Upon the Five Hundred Twentieth Objection (Substantive) of the Commonwealth
of Puerto Rico, the Puerto Rico Public Buildings Authority, and the Puerto Rico Highways and
Transportation Authority to Partially Satisfied, Deficient, and/or Duplicate Claims* [ECF No.
22255] (the “Five Hundred Twentieth Omnibus Objection”)² of the Commonwealth of Puerto Rico

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Twentieth Omnibus Objection.

(the “Commonwealth”), the Puerto Rico Public Buildings Authority (“PBA”), and the Puerto Rico Highways and Transportation Authority (“HTA,” and together with the Commonwealth and PBA, the “Debtors”), dated September 16, 2022, for entry of an order modifying certain claims filed against the Debtors, as more fully set forth in the Five Hundred Twentieth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Twentieth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Twentieth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to Be Reduced and Allowed” in Exhibit A to the Five Hundred Twentieth Omnibus Objection (collectively, the “Claims to Be Reduced”) having failed to comply with the applicable rules by not providing a valid basis for the claim, such that the Debtors cannot determine the validity of the claim; and the Court having determined that the relief sought in the Five Hundred Twentieth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Twentieth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Twentieth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Reduced are hereby modified as set forth in Exhibit A to the Five Hundred Twentieth Omnibus Objection; and it is further

ORDERED that Kroll is authorized and directed to modify the amounts of the Claims to Be Reduced set forth on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 22255 in Case No. 17-3283;
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters
arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Five Hundred Twentieth Omnibus Objection

Exhibit A - Claims to Be Reduced and Allowed

ASSERTEDMODIFIED AND ALLOWED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	CARLOS M FLORES CE & L FIRE EXTINGUISHERS PO BOX 3092 BAYAMON, PR 00960	12400	Commonwealth of Puerto Rico	Unsecured	Undetermined*	Commonwealth of Puerto Rico	Unsecured	\$195.00
Reason: Claim does not assert a stated value, however the support provided in the POC totals \$545.00 of which the Debtors show all but \$195.00 was paid on 06/13/2018 via check 00216212. The Claimant shall retain the non-modified portion of the claim. Additionally, Claim was filed as fully unliquidated, modified amount fully liquidates the Claim.								
2	CONSOLIDATED WASTE SERVICES PO BOX 1322 GURABO, PR 00778	23621	Commonwealth of Puerto Rico	Unsecured	\$2,322.44	Commonwealth of Puerto Rico	Unsecured	\$1,455.56
Reason: Invoices totaling \$636.88 were paid via checks 03087654, 03141121, 03154064, 03286745, 03286746, 03336368, 03336371, 00036422, 00075721, 00057998, and 00077475 on 03/03/2014, 06/30/2014, 08/06/2014, 07/02/2015, 11/17/2015, 06/17/2016, 10/04/2016, 12/15/2017, and 05/11/2018. The Claimant shall retain the non-modified portion of the claim. Claim #23621 also contained on Exhibit A to the 391st Omnibus Claims Objection for Modified Claims. Additionally, claimant asserted a total claim amount of \$2,332.44 in box 7 of the Proof of Claim, but the claim is docketed for \$2,322.44. As the claim is currently filed on the 391st Omnibus Claims Objection, the allowed amount of the claim should be increased by \$10.00 via the current objection to \$1,455.56.								
3	DJ AIR GROUP CORP PO BOX 10403 SAN JUAN, PR 00922	173934	Puerto Rico Public Buildings Authority (PBA)	Unsecured	\$51,946.50	Puerto Rico Public Buildings Authority (PBA)	Unsecured	\$24,084.00
Reason: Liabilities totaling \$27,862.50 asserted on Claim to be Modified are associated with the Commonwealth and duplicative of liabilities asserted on claim 29793. The Claimant shall retain the non-modified portion of the claim asserted against the Puerto Rico Public Buildings Authority (PBA).								
4	GUARAGUAO TRUCK SALES INC PO BOX 3177 BAYAMON, PR 00960-3177	38041	Commonwealth of Puerto Rico	Unsecured	\$689.53	Commonwealth of Puerto Rico	Unsecured	\$130.95
Reason: Invoices totaling \$558.58 were paid via 0000153871 and 0000154021 on 03/15/2017. The Claimant shall retain the non-modified portion of the claim.								

Exhibit A - Claims to Be Reduced and Allowed

ASSERTEDMODIFIED AND ALLOWED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
5	KEVANE GRANT THORNTON LLP 33 CALLE BOLIVIA, SUITE 400 SAN JUAN, PR 00917-2013	22137	Commonwealth of Puerto Rico	Unsecured	\$20,957.50	Commonwealth of Puerto Rico	Unsecured	\$585.00
Reason: Invoices totaling \$20,372.50 fail to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Water and Sewage Authority and Comprehensive Cancer Center of the University of Puerto Rico which are not part of the Title III proceedings. The Claimant shall retain the non-modified portion of the claim.								
6	NETWAVE EQUIPMENT CO. HÉCTOR FIGUEROA-VINCENCY, ESQ. 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	18514	Puerto Rico Highways and Transportation Authority	Unsecured	\$2,500.00	Puerto Rico Highways and Transportation Authority	Unsecured	\$416.75
Reason: Invoice totaling \$2,083.25 was paid via check 439 on 08/22/2017. The Claimant shall retain the non-modified portion of the claim.								
7	NETWAVE EQUIPMENT CO. HÉCTOR FIGUEROA-VINCENCY, ESQ. 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	8408	Commonwealth of Puerto Rico	Unsecured	\$20,250.00	Commonwealth of Puerto Rico	Unsecured	\$303.75
Reason: Invoices totaling \$19,946.25 were paid via EFTs 82662, 82663, and 82993 on 06/08/2018. The Claimant shall retain the non-modified portion of the claim.								

Exhibit A - Claims to Be Reduced and Allowed

ASSERTEDMODIFIED AND ALLOWED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
8	OUTEK CARIBBEAN DISTRIBUTORS, INC. 1605 AVE JESUS T. PIÑERO SAN JUAN, PR 00921	152821	Commonwealth of Puerto Rico	Unsecured	\$3,879.85	Commonwealth of Puerto Rico	Unsecured	\$548.95
Reason: Invoice totaling \$3,330.90 was paid via EFT 21000583 on 08/24/2020. The Claimant shall retain the non-modified portion of the claim.								
9	RAUL ORTIZ, JOSE 70 CALLE VIVES PONCE, PR 00760	130230	Commonwealth of Puerto Rico	Unsecured	\$121,771.84*	Commonwealth of Puerto Rico	Unsecured	\$17,876.28
Reason: Debtors are not liable for amount totaling \$103,895.56 per a review of the claimant's Proof of Claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. The monthly payments for the program are up to date, with the exception of May 2019 through April 2020, totaling the non-modified amount of \$17,876.28. Additionally, Claim was filed as partially unliquidated, modified amount fully liquidates the Claim.								
10	ROCA CASTRO, MARIA MILAGROS 2745 PASEO ADONIS LEVITTOWN, PR 00949	13126	Commonwealth of Puerto Rico	Unsecured	\$8,750.00*	Commonwealth of Puerto Rico	Unsecured	\$242.43
Reason: Invoices totaling \$8,507.57 were paid via EFTs 198306, 198305, 210613, 210612, 210611, 210610, 211987, 272608, 272607, and 272604 on 07/20/2020, 07/20/2020, 09/04/2020, 09/04/2020, 09/04/2020, 09/04/2020, 09/14/2020, 05/17/2021, 05/17/2021, and 05/17/2021. The Claimant shall retain the non-modified portion of the claim. Additionally, Claim was filed as partially unliquidated, modified amount fully liquidates the Claim.								
11	SUPER ASPHALT PAVEMENT CORPORATION PAVIA & LAZARO, PSC ATTN: GERARDO PAVIA CABANILLAS PO BOX 9746 SAN JUAN, PR 00908	50387	Commonwealth of Puerto Rico	Unsecured	\$356,883.94	Commonwealth of Puerto Rico	Unsecured	\$174,463.47
Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but liabilities totaling \$76,309.25 fail to provide sufficient supporting documentation for asserting the liabilities against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has valid liabilities against the Commonwealth of Puerto Rico or any of the other Title III debtors. The Claimant shall retain the non-modified portion of the claim. Claim #50387 also contained on Exhibit A to the 372nd Omnibus Claims Objection for Modified Claims.								

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Five Hundred Twentieth Omnibus Objection

Exhibit A - Claims to Be Reduced and Allowed

ASSERTEDMODIFIED AND ALLOWED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
12	UNIVERSAL CARE CORPORATION PO BOX 1051 SABANA SECA, PR 00951-1051	29	Commonwealth of Puerto Rico	Unsecured	\$9,324.41	Commonwealth of Puerto Rico	Unsecured	\$576.91
Reason: Invoices totaling \$1,247.50 were paid via checks 18316, 47989, 57998, and 96305 on 09/07/2016, 05/23/2017, 08/24/2017, and 09/18/2017. Liabilities totaling \$7,500.00 fail to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Puerto Rico Medical Services Administration which is not part of the Title III proceedings. The Claimant shall retain the non-modified portion of the claim.								